

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:14-cr-367 JAR
)	
CARLISLE ABSALOM,)	
)	
Defendant.)	

FIRST MOTION TO CONTINUE SELF-SURRENDER DATE

COMES NOW Defendant, Absalom Carlisle, by and through counsel, and hereby moves this Court to continue his surrender date to the Bureau of Prisons from April 14, 2016 at 1:00 p.m. to May 16, 2016 at that same time. In support of this motion, Defendant states as follows:

1. On December 22, 2015, this Court sentenced Defendant to 60 days in the Bureau of Prisons.
2. On March 16, 2016, Defendant received notice from the United States Marshals Service directing him to surrender to CI Adams in Natchez, Mississippi on April 14, 2016.
3. Defendant and his wife are scheduled to meet with the Department of Homeland Security in Birmingham, Alabama on April 14, 2016 for interview in connection with their marriage.
4. This interview may result in a second interview or the need for Defendant and his wife to produce documents or records for the Department of Homeland Security.
5. Defendant's incarceration on April 14, 2016 will render this interview an impossibility and slow the Department of Homeland Security's interview process for at least two

months.

6. This delay will benefit neither Defendant and his wife nor the Department of Homeland Security.

7. Accordingly, Defendant files the instant motion to obtain the time needed to complete the Department of Homeland Security's interview process prior to his surrender to CI Adams.

8. Defendant understands he will have to surrender to the Bureau of Prisons shortly and that any continuance this Court may grant will not reduce the total amount of time he must serve.

9. Defendant incurred no pretrial violations while his case was pending and has incurred none while awaiting his designation.

10. Defendant, through counsel, has discussed this matter with assistant United States attorney Reginald Harris. Mr. Harris does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue his self-surrender date to the Bureau of Prisons from April 16, 2016 at 1:00 p.m. to May 16, 2016 at that same time.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2016, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Reginald Harris, assistant United States attorney.